

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SOLID 21, INC.,

Plaintiff,

v.

RICHEMONT NORTH AMERICA, INC.;  
RICHEMONT INTERNATIONAL S.A.;  
MONTBLANC-SIMPLO GMBH; and  
OFFICINE PANERAI A.G.,

Defendants.

Civil Action No. 1:19-cv-01262-LGS

**DECLARATION OF JOHN M. PIERCE**

I, John M. Pierce, hereby declares as follows:

1. I am the Managing Partner at the law firm of Pierce Bainbridge P.C., counsel of record for Plaintiff Solid 21, Inc. ("Plaintiff") in the above-captioned action. I am an attorney authorized to practice before this Court. I am over twenty-one years of age and am not a party to this action. I make this declaration based upon my own personal knowledge of the facts asserted herein, and if called to testify, I could and would testify competently thereto.

2. I submit this declaration in connection with my Letter Motion to Withdraw as Attorney of Record.

3. Plaintiff was previously represented by my prior firm, Pierce Bainbridge Beck Price & Hecht LLP. Attorney departures and funding challenges required that firm to wind down operations and it was no longer able to competently represent Plaintiff. My new firm, Pierce Bainbridge P.C., began to represent Plaintiff, however, the primary attorney who was intended to represent Plaintiff, Vahe Mesropyan, departed the firm.

4. Pierce Bainbridge P.C. does not have the staffing or expertise to competently represent Plaintiff at this time in this complex trademark dispute. Requiring Pierce Bainbridge P.C. to do so would impose an unreasonable financial burden to hire additional competent attorneys to handle this case, for which the firm does not currently have the resources to do.

5. In addition, a dispute regarding payments from a prior case has imperiled the attorney-client relationship.

6. As a result of these circumstances, Pierce Bainbridge is no longer able to competently represent Solid 21 in this action.

7. Curtis, Brinckerhoff and Barrett was retained for the limited purpose of serving as local counsel to Pierce Bainbridge.

8. Plaintiff is aware of Pierce Bainbridge's inability to continue representing him and has elected to search for new counsel.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that it was executed on October 13, 2020 in Los Angeles, California.

Respectfully submitted,

/s / John M. Pierce

John M. Pierce

**PIERCE BAINBRIDGE P.C.**

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*Counsel for Plaintiff Solid 21, Inc.*